Response to Alabama Department of Environmental Management Comments on the Draft-Final Site Investigation (SI) Report Old Toxic Training Area, Parcel 188(7) (dated August 2002) Fort McClellan, Calhoun County, Alabama

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Comments from Stephen A. Cobb, Chief, ADEM, Hazardous Waste Branch, Land Division, as presented in a letter dated January 9, 2003.

General Comment

Comment 1: **The Alabama Department of Environmental Management (ADEM or the Department) and the Environmental Protection Agency (EPA) have both reviewed Fort McClellan's submittal of the *Draft Final Site Investigation (SI) Report and Decision Document for the Old Toxic Training Area, Parcel 188(7).* ADEM concurs with EPA's comments attached for your review and response. Please submit responses to the Department within 45 days from receipt of this letter.**

For any questions concerning this matter, please contact Mr. Phillip Stroud at 334-270-5616 or via email at pns@adem.state.al.us.

Response 1: Comment noted.

Response to U.S. Environmental Protection Agency Comments
on the Draft-Final Site Investigation (SI) Report
Old Toxic Training Area, Parcel 188(7) (dated August 2002)
Fort McClellan, Calhoun County, Alabama

Comments from Doyle T. Brittain, Senior Remedial Project Manager, dated September 11, 2002.

General Comments

Comment 1: **Page ES-2, Last sentence. The statement is made that *IT recommends "No Further Action" and unrestricted land reuse with regard to hazardous, toxic, and radioactive waste at the Old Toxic Training Area, Parcel 188(7).* This statement is disconcerting to EPA. Why would such a statement be made? No information has been brought to EPA's attention that toxic (under the EPA regulatory definition of toxic) or radioactive substances have been handled at this site. The only substances that EPA is aware of having been handled at this site fit the EPA regulatory definition of hazardous. The subject report deals only with hazardous substances. Based on the information brought to EPA's attention, the following two comments are made. If substances have been used that fit the EPA regulatory definition of a toxic or radioactive substance, EPA requests that they be brought to our attention. If not, EPA asks that such statements not be included in this or any other document regarding environmental investigation and remediation at Fort McClellan.**

Response 1: Agree. The text will be revised to indicate "...with regard to CERCLA-related hazardous substances..."

Comment 2: **Page 5-5, Line 25. This line states that chemicals that were identified as not being site-related were dropped from further consideration because their presence was not attributed to site-related chemicals. It is not appropriate to drop chemicals of potential concern (COPCs) during the Preliminary Risk Assessment because they may not be site related as they must be carried through the risk assessment process. At the end of the process, a risk management decision is made to determine if they should be included or dropped as COPCs. The chemicals removed from consideration, at this point of the risk process, must be re-included into the risk assessment process.**

Response 2: The Preliminary Risk Assessment (PRA) is an abbreviated format developed at the request of EPA Region IV as a "back-of-the-envelope" human health risk estimate for sites at the SI stage. The general approach to determining site-related chemicals is reasonable and has been used repeatedly in the approximately 20 PRAs requested by the BCT. To this point in time there

have been no objections, questions, or comments either on the way in which non-site-related chemicals were identified or on their exclusion from the list of COPCs carried forward in the quantitative risk estimation. The reviewer's statement that "[non-site-related chemicals] must be carried through the risk assessment process" is inconsistent with the Installation-Wide Work Plan, Federal EPA (2002) Guidance, the discussion led by Ted Simon at the EPA Region IV risk assessment meeting in Atlanta last year, and the BCT meeting in Alpharetta in January 2003.

Reference:

U.S. Environmental Protection Agency (EPA), 2002, ***Guidance for Comparing Background and Chemical Concentrations in Soil for CERCLA Sites***, OSWER 9285.7-41, September. (Appendix B was specifically discussed during the EPA Region IV risk assessment meeting last year).

Comment 3: <u>Appendix I, Page 3, Second Paragraph</u>. **The text states that site sample metals concentrations greater than the corresponding Background Threshold Value (BTV) or Upper Background Range (UBR) represent contamination that may be the result of site-related activities and require further assessment. The only background screening approved by EPA Region 4 is 2 times the average background concentration (i.e., the BTV). Screening using the Upper Background Range is not appropriate for use in the ERA. Any constituent removed as a COPC based solely on being less that the UBR must be re-included in the risk assessment.**

Response 3: As shown in Table 1 of Appendix I, only three metals (aluminum, arsenic, and zinc) were eliminated as COPECs based solely on comparison to upper background range. The *maximum* calculated hazard quotients for arsenic and zinc (1.69 and 1.05, respectively) were low and only slightly exceeded the threshold value of 1 suggesting that these metals are unlikely to pose adverse ecological hazards. Regarding aluminum, a review of site history did not indicate that this metal was ever used or released to the environment at this site. Furthermore, aluminum is a common element in native soils whose concentration varies over a wide range. Therefore, its presence in site samples was attributed to naturally occurring background. The PERA will be revised to more clearly indicate this information.